

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Salvatore Zicarelli,	)	
	)	
<i>Plaintiff</i>	)	
	)	No. 17-cv-3179
-vs-	)	
	)	(Judge Tharp)
Thomas J. Dart, etc., et al	)	
	)	
<i>Defendants.</i>	)	

**PLAINTIFF'S RESPONSE TO DEFENDANTS'  
SUPPLEMENTAL REQUESTS FOR PRODUCTION**

1. All documents upon which Plaintiff will rely to support claims for monetary relief.

**RESPONSE:** Tax return documents produced.

2. All documents upon which Plaintiff will rely to support claims for unpaid wages.

**RESPONSE:** Computation of unpaid wages prepared by defendant; investigation continues.

3. All documents upon which Plaintiff will rely to support claims regarding forfeited sick time.

**RESPONSE:** Computation of sick time prepared by defendant.

4. All documents upon which Plaintiff will rely to support claims for lost health insurance.

**RESPONSE:** Computations produced by defendant; investigation continues.

5. All documents upon which Plaintiff will rely to support claims for lost pension benefits.

**RESPONSE:** Documents to be obtained from the pension plan.

6. All documents upon which Plaintiff will rely to support claims of loss to Plaintiff's professional reputation.

**RESPONSE:** None.

7. All documents upon which Plaintiff will rely to support his claim for emotional pain and suffering.

**RESPONSE:** None at present. Investigation continues.

8. All documents related to the sale of the property located at 4626 Joliet Ave, Lyons IL, including but not limited to the listing agreements for the property from 2014 to 2016.

**RESPONSE:** Plaintiff is gathering these documents which will show that the sale of the property resulted in a loss.

9. All documents related to Plaintiff's psychiatric condition, if any, from September 2016 through the present, including medical records and reports.

**RESPONSE:** None other than records produced and those obtained by defendants by subpoena.

10. All documents upon which Plaintiff will rely to support his claim for reinstatement.

**RESPONSE:** None.

11. A copy of your state, federal, and local income tax filings for the years 2016 through the present, including all attachments and W-2 forms.

**RESPONSE:** Produced.

12. All documents that support any claims that Plaintiff mitigated his damages from 2016 to the present, including any job applications, email inquiries regarding jobs, cover letters, resumes, and all communications with prospective employers.

**RESPONSE:** Plaintiff has been unable to locate any such documents. Investigation continues.

Dated: October 23, 2023

/s/ Kenneth N. Flaxman